

WRANGELL COOPERATIVE ASSOCIATION

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August 1, 2017

Kristin Ryan, Director
State of Alaska
Department of Environmental Conservation
PO Box 111800
410 Willoughby Avenue #303
Juneau, AK 99811-1800

Re: Wrangell Junkyard Repository Site Concerns

Dear Ms. Ryan:

The Wrangell Cooperative Association (WCA) was recently made aware of the intent to construct the Wrangell Junkyard Repository Site with Ecobond-treated, lead contaminated material on Alaska Department of Natural Resources Pit #2, adjacent to NFS 6259 / Pats Creek Road in Wrangell, Alaska. As the local Tribal government, we were not formally notified of this project or invited to be involved as a stakeholder. In addition, the construction of a lead contaminated repository adjacent to sites currently and traditionally used by Tribal citizens for vital subsistence activities is a cause of much concern for the Tribe. The purpose of this letter is to formally request the halt of the construction of the Wrangell Junkyard Repository Site, to open transparent consultation with all stakeholders, and to explore alternative sites for construction of the repository.

As an introduction, the Wrangell Cooperative Association is a federally recognized Tribe incorporated April 30, 1942 under Section 16 of the Indian Reorganization Act of 1934, as amended for Alaska in 1936. WCA serves a membership of 550 Alaska Native and American Indians in Wrangell, Alaska. An eight-member Tribal Council, elected by the WCA membership, serves as the governing body. The WCA's mission is to support the cultural, ceremonial, and subsistence lifestyle for all Alaskans, and to promote the safe use and availability of a healthy environment for present and future generations. WCA has a government-to-government relationship with local, state, and federal agencies.

In the report titled *90% Work Plan and Conceptual Design Wrangell Junkyard Repository Site, Wrangell Alaska TD: 17-01-0015*, it is stated that the EPA, other agencies, and stakeholders conducted a site visit in August 2016 for the Wrangell Junkyard Repository Site. As a stakeholder, WCA was not notified of the repository project, invited to participate in this site visit, or collaborate on alternative options.

On July 27, 2017, Robert Dalrymple, Wrangell District Ranger with the United States Forest Service (USFS), received notification of intent to begin construction of the monofill on July 31, 2017, after Mr. Dalrymple expressed concern to the United States Environmental Protection Agency (EPA) regarding potential impact to adjacent USFS lands. Mr. Dalrymple stated in his letter to the EPA that the work plan and report for the repository “did not mention the anadromous fish streams, including Pats Creek, just below the repository site or a discussion of the effects the lead repository could have on those streams or the people who use them. Pats Creek flows into Pats Lake and both support subsistence and sport fisheries. Pats Lake is a popular place for Wrangell families to swim, boat, and fish”. Until receiving notification of intent to begin construction, Mr. Dalrymple’s office had not been formally notified of the project or invited to be involved as a stakeholder, although transport of the lead contaminated material would occur in an estimated 1,875 dump truck loads over USFS roads, and permanent storage would be adjacent to USFS lands.

Mr. Dalrymple’s concerns mirror those of WCA. According to the July 7, 2017 letter, written by you to Sheryl Bilbrey, Director of the Office of Environmental Cleanup, “lead is still present in the material that qualify it as polluted soil under State regulation. If consumed by humans, plants, or animals, the lead may have some bioavailability that is potentially toxic”. The repository site and adjacent land is pristine environment, used extensively by Tribal members for subsistence activities, including hunting, fishing, berry and medicinal gathering; wood gathering; and recreational activities. The Tribe has a historic connection to this land tracing back through the generations. Tribal citizens also practice subsistence activities along the route the lead contaminated material will travel before reaching the repository.

The WCA, in keeping with its mission to support the cultural, subsistence and ceremonial lifestyle of all Alaskans, and to promote the availability of a healthy environment for present and future generations, formally requests the halt of the construction of the Wrangell Junkyard Repository Site. The Tribe requests that involved stakeholders be made aware of the project and the history of the project planning. The Tribe requests that the community of Wrangell be made aware, through all available local media avenues, of the Wrangell Junkyard Repository Site project. Lastly, the Tribe requests that all stakeholders collaborate to discuss an alternate location, other than a traditional Tribal subsistence area, for permanently housing the lead contaminated material from the Wrangell Junkyard.

I may be contacted at (907) 874-4304 or at wcatribes@gmail.com. We appreciate your timely assistance in this matter.

Sincerely,

A handwritten signature in cursive script, appearing to read "Richard Oliver".

Richard Oliver
Tribal President
Wrangell Cooperative Association

CC: Bill Walker, Governor, State of Alaska

Byron Mallott, Lieutenant Governor, State of Alaska

Lisa Murkowski, United States Senator, State of Alaska

Don Young, United States Representative, State of Alaska

Richard Peterson, President, Central Council Tlingit and Haida Indian Tribes of Alaska

Will Ware, Governor's Transportation Advisory Board

Sheryl Bilbrey, Director, Office of Environmental Cleanup

Jeff Fowlow, On-Scene Coordinator, Spill Prevention and Removal Unit

David Jack, Mayor, City and Borough of Wrangell

Robert Dalrymple, District Ranger, United States Forest Service, Wrangell District